

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

JENNIE COURTNEY,
AS ADMINISTRATRIX OF THE
ESTATE OF DENNIS COURTNEY,
DECEASED,

PLAINTIFF,

v.

ANTHONY CLARK, et al.

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CIVIL ACTION NO.:
2:06-CV-00600-MHT
(Removed from the Circuit Court of
Covington County, AL; CV-06-110)

NOTICE OF SERVICE OF DISCOVERY DOCUMENTS

Please take notice that the undersigned counsel for Plaintiff has electronically filed using the CM/ECF system, and service by United States mail first class postage prepaid on this date, served on counsel for the Defendant, the following discovery pleadings:

X Plaintiff's Interrogatories and Request for Production of Documents to Defendant, Jerry Wayne Edgar, Individually and in his Official Capacity as Sheriff's Deputy in Covington County, Alabama

Done this the 4th day of January, 2007.

Respectfully submitted,

/s/ Will G. Phillips
WILL G. PHILLIPS (PHI044)
Attorney for Plaintiff

OF COUNSEL:

GREENE & PHILLIPS ATTORNEYS AT LAW, L.L.C.
50 North Florida Street
Mobile, AL 36607
(251) 478-1115
(251) 471-3920 – FAX

CERTIFICATE OF SERVICE

I hereby certify that I have on this the 4th day of January, 2007, I electronically filed the foregoing with Clerk of the Court using the CM/ECF system which will send notification of such filing to the following and by placing a copy of same in United States Mail, properly addressed and first-class postage prepaid, as follows:

Daryl L. Masters, Esq.
Gary L. Willford, Jr., Esq.
7475 Halcyon Pointe Drive
Montgomery, Alabama 36124

/s/ Will G. Phillips
WILL G. PHILLIPS

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CIVIL ACTION NO.:
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Covington County, AL; CV-06-110)

**PLAINTIFF'S FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO JERRY WAYNE EDGAR, Individually and in his capacity as a
Sheriff's Deputy in Covington County, Alabama**

COMES NOW the Plaintiff in the above styled cause, pursuant to the *Federal Rules of Civil Procedure* and propounds the following First Interrogatories and First Requests for Production of Documents to the Defendant, JERRY WAYNE EDGAR to be answered and responded to fully and completely within the time required by the law.

DEFINITIONS AND INSTRUCTIONS

1. The term "you" and "your" shall mean and refer to each of the defendants, their agents, employees or subsidiaries.
2. The term "person" or "persons" shall mean all entities, including but not limited to, all individuals, associations, companies, partnerships, joint ventures, corporations, trusts, estates, public agencies, departments, bureaus, and boards.

- a. Any and all materials, writings, documents, reports, memorandum or any material of any type whatsoever that was relied upon in the preparation of answers to these interrogatories;
- b. Any and all trial exhibits

GREENE & PHILLIPS, L.L.C.
Attorneys for Plaintiff

BY: /s/ Will G. Phillips

WILL G. PHILLIPS (philw3586)

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CERTIFICATE OF SERVICE

I do hereby certify that I have on this the 4th day of January, 2007, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States mail, properly addressed and postage prepaid to:

Daryl L. Masters, Esq.
Gary L. Willford, Jr., Esq.
Webb & Eley, P.C.
7475 Halcyon Pointe Drive
Montgomery, Alabama 36124

/s/ Will G. Phillips
WILL G. PHILLIPS